

**WORK ACTIVITY**  
**Video Taping 8-in Track Storm Drain System**  
**in the Texaco Slot Area**

ACTA, POLB and POLA have been served with an Order for Removal, Mitigation or Prevention of a Substantial Threat of Oil Discharge by the USEPA (OPA CWA 311-09-2011-0001). It has been jointly agreed between the parties that ACTA will take the lead in implementing all necessary actions to remove, mitigate or prevent a substantial threat from the discharge of oil or hazardous substances into or on navigable waters or adjoining shorelines associated with the identified spill.

The site is located along the ACTA Right of Way south of Alameda Street adjacent to the Tesoro Refinery in an area commonly referred to as the Texaco Slot. It appears that fugitive oily product has entered the 8-in diameter track storm drain system within the ACTA Right of Way in the area north of Pacific Coast Highway and then migrated south with the recent high storm activity in the Southern California area where the oily waste was discharged into Leeds Ave near the intersection with Grant Street.

In the first and second week of January, National Plant Services (an USEPA contractor) inspected a portion of the 8-in track storm drain system starting at the manholes located about 120-ft south of PCH and proceeding north in both the west and east side track drains. Inspection was performed by inserting a remote controlled robotic crawler camera into the drains, viewing the results on a monitor above ground and also videotaping the findings for future reference. It is our understanding that the inspection of the west drain concluded at the cleanout located at Station 978+70 due to a blockage and in the east drain at Station 976+40 due to the loss of traction. The blockage appears to have been caused by ballast entering through a damaged cleanout into the track drain and the loss of traction was caused by a thick layer of oil in the bottom of the track storm drain system. ACTA proposes to continue the inspection of the track storm drain system starting at the same manholes located about 120-ft south of PCH (Station 983+30) but working south. National Plant Services will be contracted to also perform these activities.

The following outlines the order in which sections of the 8-in diameter perforated pipe will be inspected and videotaped. Refer to the attached drawing for locations.

Section A = West side proceeding north and south as needed, between manholes at Station 983+30 and Station 999+00. If additional blockages are encountered along the path, then the camera will be moved to the intermediate manholes or clean out locations and the video camera inspection will proceed in the opposite direction as necessary to complete the inspection process.

Section B = East side proceeding north and south as needed, between manholes at Station 983+30 and Station 999+00. If additional blockages are encountered along the path, then the camera will be moved to the intermediate manholes or clean out locations and the video camera inspection will proceed in the opposite direction as necessary to complete the inspection process.

Section C = West side proceeding north and south as needed, between manholes at Station 999+00 and Station 1002+25.

Section D = West side proceeding north and south as needed, between manholes at Station 1002+25 and Station 1002+60.

Section E = Proceed east and west as needed, between manholes at Station 1002+60 (west side) and Station 1002+80 (east side).

Section F = East side proceeding north and south as needed, between manhole at Station 999+00 and where the track storm drain system tees into Segment E.

At the conclusion of the inspection activities, a report will be completed along with a copy of the videotape generated during the inspection activities and provided to the USEPA. This report will document the location of any blockages, the presence of oil, and other significant findings. ACTA is proceeding with the work under a full reservation of all its rights, remedies, and defenses.